REMARKS

Upon entry of the present Response, claims 1-11 remain pending.

Initially, Applicants wish to thank the Examiner the indication that the drawings filed on November 7, 2003 have been accepted and for attaching the Notice of References Cited.

In the outstanding Official Action, the Examiner rejected claims 1-11 under 35 U.S.C. § 103(a) as being unpatentable over HEITKAMP et al. (U.S. 6,970,961) in view of JEFFRIES (U.S. 6,009,479).

Applicants traverse the rejections of claims 1-11, and respectfully request reconsideration and withdrawal of the same, for at least the following reasons.

Claim 1 recites features of a network system connected with multiple master devices, including a "a network manager configured to generate the control command and to automatically search for a unique address associated with the master device or, when the search is unsuccessful, assign a specific address to the master device to install the master device to the network when the master device is newly connected to the network".

The Examiner correctly indicated that HEITKAMP et al. does not disclose a network manager configured to generate the control command and to automatically search for a unique address associated with the master device, or, when the search is unsuccessful, assign a specific address to the master device to install the master device to the network when the master device is newly connected to the network. Instead, the Examiner attempted to rely upon JEFFRIES to compensate for the deficiencies of HEITKAMP et al.

However, JEFFRIES is also deficient. JEFFRIES discloses that the SMB master

determines whether any of the SMB slaves reside at the class address. If so, then the SMB master

determines a unique address and issues a Get Bitwise UID command to the slaves residing at the

class address (col. 3, lines 29-35). While JEFFRIES indicates that each SMB agent is a processor,

controller, microcontroller or the like that can operate in either a master of slave mode and can also

operate as either a transmitter or receiver (col. 7, lines 24-27), JEFFRIES also recognizes the

inherent distinctions between an SMB master and an SMB slave. That is, JEFFRIES indicates that

the difference between an SMB master and an SMB slave is that the master initiates transactions

on the bus (col. 7, lines 27-29). Thus, JEFFRIES is clear that a master is distinct from a slave. In

JEFFRIES, if a new slave is added to the SMB bus, then within a short period the SMB master

performs the above steps and automatically assigns a new unique address to the SMB slave added.

Since the SMB master periodically performs the automatic configuration to assign unique

addresses to the SMB slaves, a new SMB slave is "hot pluggable" into the SMB bus. A new SMB

slave subsequently added to the SMB bus receives a unique address without user intervention (col.

8, line 64 - col. 9, line 4). Thus, SMB master of JEFFRIES is assigning unique addresses to SMB

slaves, not to a master device as recited in claim 1.

Further, as discussed above, it is the SMB master of JEFFRIES that periodically performs

the automatic configuration to assign unique addresses to the SMB slaves. On the other hand,

claim 1 of the present application recites, *inter alia,* a network manager configured

to…automatically search for a unique address associated with the master device or, when the

search is unsuccessful, assign a specific address to the master device...". Thus, JEFFRIES uses a

master to assign unique addresses to slaves, while claim 1 recites features of a network manager (a

distinct element) that searches for a unique address associated with the master device or, when the search is unsuccessful, assigns a specific address to the master device, *i.e.*, a network manager that is distinct from a master device.

The Examiner apparently indicated that HEITKAMP et al. discloses a network manager, but admits that HEITKAMP et al. fails to disclose a network manager configured to generate the control command and to automatically search for a unique address associated with the master device or, when the search is unsuccessful, assign a specific address to the master device to install the master device to the network when the master device is newly connected to the network. As discussed above, JEFFRIES uses a master to assign unique addresses to slaves rather than a distinct and network manager to assign a specific address to a master device. Accordingly, given their incompatibility, it would be improper to combine the teachings of HEITKAMP et al. and JEFFRIES, *i.e.*, it is improper to combine references where the references teach away from their combination. *In re Grasselli*, 713 F. 2d 731, 743, 218 USPQ 769,779 (Fed. Cir. 1983). In *KSR International Co. v. Teleflex Inc. et al.*, 550 U.S. ___ (2007), the Court supported this proposition.

Thus, neither HEITKAMP et al. nor JEFFRIES, either individually or in any proper combination, teach the combination of features recited in claim 1.

Claims 2 and 3 of the present application recite features of a network system associated with a plurality of home appliances connected to the network. The Examiner indicated that HEITKAMP et al. discloses these features at col. 1, lines 55-67 and col. 2, lines 5-10. However, neither HEITKAMP et al. nor JEFFRIES discloses, mentions, or even suggests an appliance, home appliance, or even a home. If the Examiner maintains the rejection of claims 2 and 3, then the

Examiner is requested to specifically identify the passage(s) in the applied documents in which home appliances connected to a network are disclosed.

Further, JEFFRIES does not disclose the features of searching for a unique address associated with the master device and notifying a plurality of home appliances connected to the network that the master device comprising the unique address has been appropriately connected to the network, as recited in the combination of independent claim 8, or determining whether the home appliance is a master device and connecting a new home appliance to the network, as recited in the combination of independent claim 10. As explained above, JEFFRIES uses a master to assign unique addresses to slaves and as such, does not search for a unique address associated with a master device, nor determine (in part, because it does not have to, since it assigns addresses only to slaves) whether a home appliance is a master device. Further, if the Examiner maintains the rejection of claims 8 and 10, then the Examiner is requested to specifically identify the passage(s) in the applied documents in which home appliances connected to a network are disclosed.

HEITKAMP et al. and JEFFRIES, individually or in any proper combination, do not disclose each and every element of independent claims 1, 8, and 10. Consequently, claims 1, 8, and 10 are in condition for allowance. With regard to dependent claims 2-7, 9, and 11, they are allowable on their own merit, in addition to being allowable for depending either directly or indirectly from independent claims 1, 8, or 13, which Applicants have shown to be allowable. Thus, at least in view of these arguments, claims 1-11 are in condition for allowance.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejection of the claims, as well as an indication of the allowability of each of the claims
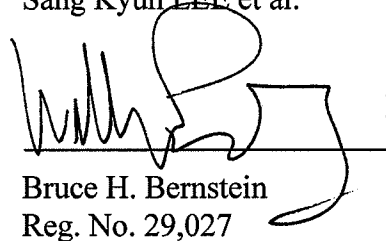
in view of the above remarks. Such action is respectfully requested and is believed to be appropriate and proper.

SUMMARY AND CONCLUSION

Applicants believe that the present application is in condition for allowance, and respectfully request an indication to that effect.

Should the Examiner have any further questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
Sang Kyun LEE et al.

William Pieprz
Reg. No. 33,630

Bruce H. Bernstein
Reg. No. 29,027

June 12, 2008
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191